

the Elk Hills oilfield boundary is the main reason that injectate will not migrate past this boundary. Numerous calculations using a variety of waste plume geometries and formation characteristics have been done, demonstrating that even under significantly less favorable conditions, the waste front is not likely to migrate off-site<sup>3</sup>.

Attachment 1 of the Underground Injection Control Permit Application, dated September 21, 1999, shows that extensive drilling already has been done in the area of the proposed injection wells. Ms. Fox's idea to drill seven additional wells in this area is not reasonable given the amount of subsurface data already available.

### Injectate Analysis

CURE claims that injectate arsenic levels would be concentrated to about 29 mg/l, which would violate *proposed* drinking water standards. Ms. Fox is citing a proposed regulation, not an existing and applicable one. CURE's submittal also demonstrates that even native Tulare groundwater fails to conform to the proposed arsenic standards. *See Bruce*

### Monitoring Plan

A monitoring plan with quarterly sampling and reporting will be provided.

### Corrective Action Plan

Abandoned well 2-18G is being reviewed. Corrective action will be proposed as necessary. *Call D. H.*

### Fluid Compatibility

It is in the best interest of Elk Hills Power to prevent formation damage caused by fluid incompatibility. The types of potential problems discussed by Ms. Fox can be successfully mitigated using various pre-injection filtration and chemical treatment methods. Any fluid compatibility analyses will be much more accurate if actual injectate samples are analyzed.

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<sup>3</sup> SJEC letter of 3-7-00.